

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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INDUSTRIAL CARRIERS INC.,

Plaintiff,

- against -

DAYTON COMMERCIAL LIMITED a.k.a.
GALVANIZED STEEL CONSUMERS
ASSOCIATION a.k.a. GSCA a.k.a.
GSCA LIMITED a.k.a. TOP UNION,

Defendant.
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07 CV 7937 (RMB)
ECF CASE

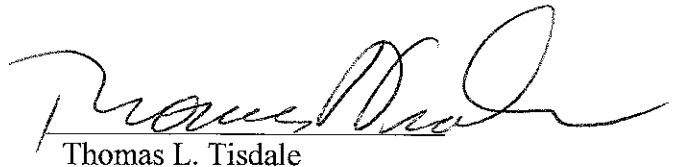
SECOND DECLARATION OF THOMAS L. TISDALE

THOMAS L. TISDALE, an attorney at law, declares under penalty of perjury as follows:

1. I am an attorney admitted to practice before this Court and am a member of the law firm of Tisdale Law Offices, LLC, attorneys for the Plaintiff, Industrial Carriers Inc. ("ICI"). I submit this Declaration on behalf of ICI in support of its opposition to Top Union (China) Ltd.'s ("Top Union") motion to vacate maritime attachment.

2. The purpose of this Declaration is to place before the Court the fixture recap of the MV Manas in further support of Plaintiff's opposition to Top Union's motion to vacate maritime attachment. *See MV Manas Fixture Recap annexed hereto as Exhibit "6."*

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct.


Thomas L. Tisdale